

EXHIBIT “J”

Jul. 12. 2016 2:18PM

VOL. 0399 P. 28

Respectfully submitted,

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By:


Frank D. Calvert
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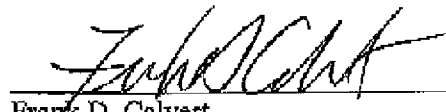
ATTORNEYS FOR DEFENDANTS,
CITY OF KIRBYVILLE, CHIEF PAUL
BRISTER, AND OFFICER JOSH HANCOCK
OF THE CITY OF KIRBYVILLE POLICE
DEPARTMENT, INDIVIDUALLY AND IN
THEIR OFFICIAL CAPACITIES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was
furnished to all counsel of record by:

XX By Telefacsimile

on this 12th day of July, 2016.


Frank D. Calvert

Jul. 12. 2016 2:18PM

No. 0399 P. 29

**CITY OF KIRBYVILLE'S RESPONSE TO PLAINTIFF'S
SECOND REQUEST FOR PRODUCTION**

REQUEST 16: Any and all audio recordings of any type made of the conversations between defense counsel and witness Krissy Thomas-Adams made or recorded prior to her signing her affidavit dated April 28, 2016. Specifically including the audio recording mentioned in Krissy Thomas-Adams' deposition at 70:12-71:8.

RESPONSE:

None.

REQUEST 17: Any and all audio recording devices of any type used to record the conversations between defense counsel and witness Krissy Thomas-Adams made or recorded prior to her signing her affidavit dated April 28, 2016. Specifically including the audio recording mentioned in Krissy Thomas-Adams' deposition at 70:12-71:8.

RESPONSE:

None.

Jul. 12. 2016 2:11PM

No. 0399 P. 1

CALVERT EAVES CLARKE & STELLY, L.L.P.
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DATE: July 12, 2016

TO: Mr. Ronnie Turner, Jr.
PROVOST UMPHREY LAW FIRM, L.L.P.
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RE: City of Kirbyville's Answers to Discovery

FROM: Frank Calvert/cdf

PHONE # (409) 832-8885

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